

1 BRIAN J. STRETCH (CABN 163973)  
2 United States Attorney

3 BARBARA J. VALLIERE (DCBN 439353)  
4 Chief, Criminal Division

5 JULIE D. GARCIA (CABN 288624)  
6 Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055  
8 San Francisco, California 94102-3495  
9 Telephone: (415) 436-6758  
10 FAX: (415) 436-7234  
11 Julie.Garcia@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA, ) NO. CR 17-395 EMC-2  
17 Plaintiff, )  
18 v. )  
19 NELSON DECUIRE, a/k/a "Vader," and ) STIPULATION TO EXCLUDE TIME AND  
20 AISHAH BUENAVENTURA, ) [PROPOSED] ORDER  
21 Defendants. )  
22 \_\_\_\_\_)

23 **STIPULATION**

24 IT IS HEREBY STIPULATED, by and between the parties to this action, as stated on the record  
25 at the status conference on October 23, 2017, that the time between October 23, 2017, and November  
26 15, 2017, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B).  
27 Excluding time until November 15, 2017, will allow defense counsel the reasonable time necessary for  
28 effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C.  
29 § 3161(h)(7)(B)(iv).

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1 IT IS SO STIPULATED.

2 DATED: October 30, 2017

BRIAN J. STRETCH  
United States Attorney

6 DATED: October 30, 2017

4 /s/  
5 JULIE D. GARCIA  
6 Assistant United States Attorney

7

8 /s/  
9 MICHAEL STEPANIAN  
10 Counsel for Defendant  
11 AISHAH BUENAVENTURA

11 **[PROPOSED] ORDER**

12 As explained on the record during the October 23, 2017, status conference, the Court finds that  
13 the exclusion of the period from October 23, 2017, to November 15, 2017, from the time limits  
14 applicable under 18 U.S.C. § 3161, is warranted; that the ends of justice served by the continuance  
15 outweigh the interests of the public and the defendant in the prompt disposition of this criminal case;  
16 and that the failure to grant the requested exclusion of time would unreasonably deny defense counsel  
17 the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,  
18 and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

19 IT IS SO ORDERED.

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21 DATED: 11/13/17

